COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: October 4, 2002

VZ-ATT/WC 3-1: Please provide a complete copy of the switch contract executed between AT&T and Lucent, as well as any other accompanying materials, submitted in response to Verizon-Virginia's interrogatory VZ-VA 1-1 in CC Docket No. 00-218 before the Federal Communications Commission.

Respondent: C. Pitts

RESPONSE:

See the attached. The response to VZ-VA 1-1 and the accompanying switch contract between AT&T and Lucent contain proprietary information and therefore only is being provided to the Department and the parties who have signed a protective agreement with AT&T.

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VZ-ATT/WC 3-2: Referring to page 5 of Ms. Pitts' Testimony, please provide all documentation, studies, data, workpapers, surveys and any other material supporting Ms. Pitts' statement that "switching vendors allow telephone companies to buy growth equipment for a new switch at new switch prices for a period of time, which is usually between one and three years." In addition to providing the foregoing documents, please explain the basis for Ms. Pitts' statement that "I chose a midpoint of 1 ½ years of growth as being purchased at new prices, because it is the most reasonable approximation of the actual manner in which new switch prices are applied by the vendors."

Respondent: C. Pitts

RESPONSE:

Attached at tabs 1 and 2 are portions of documents produced by Verizon in this case, and already in the record, which demonstrate that switch vendors allow Verizon to buy growth equipment for a new switch at new switch prices for a period of one to three years:

1. Nortel Switch Megabid Agreement, page 15 of 29 (section 6.6), produced by Verizon in response to ATT-VZ 3-1. This agreement shows that Verizon receives replacement switch pricing for purchases of growth up to 10%. The ten percent growth can be converted to years growth by assuming an annual growth rate and determining how many years it would take to reach ten percent. For example, at 3 percent annual growth, ten percent would equate to approximately three years growth.

2. Bell Atlantic Digital Switching System Input Data for Vendor Quotes, page 1, produced by Verizon in response to RR-ATT-3 and attached as Exhibit 3 to Ms. Pitts' direct testimony on reconsideration. This document shows that all estimates are "End of Period," not current estimates.

These documents are proprietary to Verizon and only are being provided to the Department and Verizon.

In making the statement at page 5 of my direct testimony and referred to by Verizon above, I also relied on documentation from non-Verizon jurisdictions. However, I may not disclose this non-Verizon documentation which shows that telephone companies can buy growth equipment at new switch prices for a period of one to three years because these documents are subject to proprietary agreements.

I chose a midpoint of 1½ years of growth purchased at new switch discount prices based on personal knowledge and the documents specific to Verizon listed above indicating that one to three years growth is typically provided at new/replacement switch prices.

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VZ-ATT/WC 3-3: Referring to page 6 of Ms. Pitts' Testimony, describing her selection of an annual line growth rate of 1.5%, please identify and provide the information and analysis that Ms. Pitts relied upon in selecting 1.5%, beyond that given in her statement that "on the basis of Verizon's forecast, I assumed 1.5% annual line growth." Considering the fact that Verizon MA's 1.5% growth rate is based on a three year growth cycle, please discuss why Ms. Pitts has not considered the use of a higher annual line growth rate given her use of a much longer twelve year time horizon.

Respondent: C. Pitts

RESPONSE:

I relied on the detailed forecast data supporting a 1.5% annual line growth rate that Verizon provided in response to ATT-VZ 4-29-2S. I did not perform additional analyses or rely on other information.

I did not use an annual line growth rate higher than 1.5% because Verizon has not provided any evidence that the rate of growth in the number of switched access lines is likely to increase in the face of DSL, cable modem and cell phone technologies.

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VZ-ATT/WC 3-4: Referring to page 7 of Ms. Pitts' Testimony, please provide all documents that Ms. Pitts is aware of that discuss or refer to the "actual practice" mentioned in her testimony.

Respondent: C. Pitts

RESPONSE:

Refer to the response and documents provided in VZ-ATT/WC 3-2 above.

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VZ-ATT/WC 3-5: Referring to page 10 of Ms. Pitts' Testimony, please enumerate those "costs" referred to by Ms. Pitts in her statement that "Verizon's competitive bid data demonstrates that this $36 per line investment is too high because it includes costs that already are accounted for in other parts of the Verizon cost study."

Respondent: C. Pitts

RESPONSE:

Refer to Ms. Pitts' direct testimony on reconsideration at pages 13 (lines 3-20) and 14 (lines 1-8).

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VZ-ATT/WC 3-6: Please provide the basis for Ms. Pitts' statement on page 11 of her Testimony that "it appears that the $36 per line includes the costs of software and features which already have been included in Verizon's cost study separate from the SCIS inputs."

Respondent: C. Pitts

RESPONSE:

Refer to Ms. Pitts's direct testimony on reconsideration at pages 13 (lines 16-20) and 14 (lines 1-8).

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VZ-ATT/WC 3-7: Referring to footnote 4 of Mr. Turner's Testimony, please explain how the weighting in cell D76 of Mass Part CA, Workpaper 5.0 shows the cabling costs from the power plant to BDFBs to be included in the DC Power Consumption element.

Respondent: S. Turner

RESPONSE:

D76 is an incorrect cell reference. My prefiled direct testimony on reconsideration should have stated in footnote 4 that "Cell D92 shows the weighting where BDFB and cabling cost is included." I inadvertently typed in the "row" from Verizon's paper spreadsheet (Row 76) and ascribed this to the spreadsheet cell reference. The correct cell reference in the electronic version of Verizon's study is D92 which shows the percentage of time Verizon assumes cabling costs from the power plant to the BDFB. This proprietary percentage can also be found at Row 76, column B, in the paper version of Workpaper 5.0. The percentage includes the cabling costs from the power plant to the BDFBs because Verizon would include in the BDFB investment the cabling to connect the BDFB to the power plant. This is the common practice I have observed in reviewing numerous DC power collocation cost studies across the country.

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VZ-ATT/WC 3-8: Referring to pages 7 and 8 of Mr. Turner's Testimony, in which rate element (i.e., Power Consumption or Power Distribution) does Mr. Turner believe cabling costs are included in those situations where "the CLEC actually cables directly back to the Verizon power distribution panel bypassing the Verizon BDFB"?

Respondent: S. Turner

RESPONSE:

CLECs that obtain power directly from the Verizon power distribution panel pay for the cables in the Power Consumption element. Verizon's cost study is clear that the cabling cost between the power distribution panel and the BDFB is included in the Power Consumption element weighted at a *****BEGIN VZ CONFIDENTIAL** XXX **END VZ CONFIDENTIAL***** percent probability. Under Verizon's *****BEGIN VZ CONFIDENTIAL** XXX **END VZ CONFIDENTIAL***** percent assumption, the CLEC that obtains power directly from the Verizon power distribution panel is paying in the Power Consumption element for the BDFB investment, including cables from the BDFB to the power plant, even though that CLEC provides its own BDFBs. The question of whether this same CLEC pays for the cabling through other charges, such as nonrecurring charges, is a terms and conditions question and is still open in that the current collocation tariff is unclear on this point.

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VZ-ATT/WC 3-9: Please provide all documentation supporting the assertion that, in Verizon California central offices, "BDFBs normally are placed near columns at the end of telecommunications equipment and are placed approximately every three rows throughout the central office."

Respondent: S. Turner

RESPONSE:

I toured several Verizon central offices in Southern California. In some instances, I was provided floor diagrams showing the placement of telecommunications equipment throughout the office. However, I was not permitted to retain those drawings and consequently cannot provide them to Verizon.

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VZ-ATT/WC 3-10: Referring to the assertion on page 10 of Mr. Turner's Testimony that his "engineering experience [is] informed by being in numerous telecommunications central offices, including those of . . . Verizon," please provide the number and location of all Verizon California central offices in which Mr. Turner has seen equipment of rows and associated BDFBs.

Respondent: S. Turner

RESPONSE:

I have been in at least eight Verizon California central offices. Seven of these central offices are in the Los Angeles area. I toured two of these central offices twice. The eighth central office is in Victorville, California. In five of these central offices I conducted detailed inspections of every frame in the central office for a report that I filed with the California Public Utilities Commission regarding Verizon's use of space within the central office. Part of my preparation for this report was detailed reviews of building footprints showing the placement of telecommunications equipment throughout the office. My understanding of the protective agreement regarding my tours of the central offices precludes me from providing a copy of these reports to Verizon in Massachusetts. However, Verizon should be able to obtain these reports from its counsel in California. The central offices by CLLI code that I have toured include, but are not limited to: VTVLCAXA, DWNYCAXF, MNRVCAXG, DMBRCAXF, and CCMNCAXF.

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VZ-ATT/WC 3-11: Please provide all documentation supporting the assertion on page 14 of Mr. Turner's Testimony that, in Texas, 2-20 Amp DC power distribution feeds have a nonrecurring cost of $369.03 and 2-50 Amp DC power distribution feeds have a nonrecurring cost of $643.12. In particular, please provide the cost studies supporting these numbers and explain all costs reflected in those studies.

Respondent: S. Turner

RESPONSE:

Please see the attached (public) compliance collocation cost study Southwestern Bell filed in Texas. Because of the voluminous nature of this cost study, it is only being filed electronically.

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VZ-ATT/WC 3-12: Apart from testimony presented in this proceeding (D.T.E. 01-20), has Mr. Turner performed an analysis of any other incumbent local exchange carrier's cabling costs? If so, please provide all such analyses and supporting documentation.

Respondent: S. Turner

RESPONSE:

AT&T and WorldCom object to this information request on the grounds that it is overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. AT&T and WorldCom also object on the ground that the request seeks proprietary information which Mr. Turner may not disclose pursuant to protective agreements in other jurisdictions.

Subject to and without waiving these objections, AT&T and WorldCom state that Mr. Turner has conducted DC power cabling cost analyses in at least the following states: Texas, Missouri, Oklahoma, Kansas, Michigan, Wisconsin, Delaware, Pennsylvania, Minnesota, Washington, California, Nevada, Hawaii, Georgia, and Alabama.